

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
ALBANY DIVISION

ARDRA HARRIS,

Plaintiff,

v.

**AMERICANWORK, LLC formerly
known as Americanwork, Inc.,**

Defendant.

Civil Action No. 1:20-cv-94 (WLS)

Declaration of Charles R. Bridgers

Pursuant to 28 U.S.C. §1746 and in accordance with the Court's Order dated January 5, 2021 [Dkt. 15] Charles R. Bridgers hereby submits his declaration in further support of the Parties Joint Motion for Approval Settlement.

1. My name is Charles R Bridgers. I am over the age of twenty-one (21) and suffer from no legal disabilities. I make the following Declaration based on my personal knowledge as well as the contemporaneous business records of my firm.
2. I have been practicing law since my graduation, *cum laude*, from Georgia State College of Law in 1993. I am admitted in all state courts in Georgia, the United States District Court for the Northern and Middle Districts of Georgia, as well as the United States Court of Appeals for the Third, Sixth, and Eleventh Circuits. I have practiced employment law since approximately 1996 primarily in the Atlanta metropolitan area but also throughout the state

of Georgia. I have been a presenter at several CLE sessions including, most recently, in December of 2019 where I spoke on a wage and hour update panel at the Labor & Employment Law Institute (State Bar) and in September of 2016 where I presented a paper on Certification and Decertification of § 216(b) Collective Actions under the Fair Labor Standards Act. My practice began to focus on the Fair Labor Standards Act in 2009. I have served as counsel in approximately 340 FLSA cases since that time. I hold an AV rating in the Martindale-Hubble Law Directory and have recently been selected in the Super Lawyers program.

3. During my career, I have on several occasions represented employees in collective actions under the FLSA. In 2014, I represented 36 warehouse workers who alleged they were misclassified as independent contractors in *Jamaal Foster, et al. v. A-1 Quality Labor Services, LLC*, 1:11-CV-3342-JEC. That case resulted in a settlement of \$400,000. In 2013 and 2014 I represented 13 Fire Lieutenants and 2 Battalion Chiefs against the City of East Point who alleged that they were misclassified as exempt. That settlement resulted in significant back pay and an agreement to reclassify the Lieutenants and Battalion Chiefs as non-exempt. *Brandon Ervin, et al. v. City of East Point, Georgia*, 1:12-CV-04270-CAP.
4. During my twenty-five plus years as an attorney, I have conducted approximately eighteen jury trials as well as a number of bench trials. In August 2013, for instance, a jury awarded our five clients contractually owed severance pay and attorneys' fees and costs of approximately \$500,000

in *Dr. Johnny Wilson, et al. v. Clark Atlanta University, Inc.*, Superior Court of Fulton County, Georgia, Civil File Action No. 2011-CV-196090. Other recent jury trials involving employment matters where I served as counsel include *Baker v. Baldwin Paving Company, Inc.*; 1:14-cv-03367-LMM (FLSA); *Nelson v. Jackson*; 1:14-cv-02851-ELR (ADA); *Sayyed v. Braids, Weaves & Things, Inc.*; 1:16-cv-01392-CAP (Title VII); and *Jackson v. P & K Restaurant Enterprise, LLC, et al.*; 1:15-cv-00753-MHC (FLSA).

5. Since April of 2020, along with the law firm of DeLong, Caldwell, Bridgers, Fitzpatrick & Benjamin, LLC, I have represented the Plaintiff in this action. I shared primary responsibility for prosecuting this matter with my law partner Mitchell D. Benjamin and our Senior Associate Matthew W. Herrington.
6. Our firm has a practice of keeping contemporaneous time and expense records as part of our regular business activity. Individual slips (or records of activities and costs) are created by persons with knowledge of the activities described. The information is tracked in Timeslips, our time and billing software. I assign certain tasks to other attorneys and to our staff members. As such, I am generally aware of these timekeepers' activities. As part of my typical routine, I review time and billing records on a regular basis. A true and correct copy of the firms billing records for fees is attached hereto as Attachment A. A true and correct copy of the firm's billing records for costs is attached hereto as Attachment B. These records are an accurate

representation of the time, effort, and costs incurred in prosecuting this matter.

7. In total, the firm has incurred \$13,553.27 in billable attorney fees (per Attachment A) and \$485.00 in expenses (per Attachment B) in prosecuting this action, for a total of \$14,038.27.
8. The following persons recorded billed time in this matter (per Attachment C):

Time Keeper	Position	Billable Rate	Total Billed
Charles R. Bridgers	Partner	\$425	\$3,570.71
Mitchell D. Benjamin	Partner	\$425	\$3,690.39
Matthew W. Herrington	Senior Associate	\$350	\$1,400.00
Jessica Sorrenti	Senior Paralegal	\$165	\$4,336.75
Sarah Toenes	Paralegal	\$125	\$275

9. Based on my extensive experience in litigating civil rights and labor and employment claims including the FLSA, I am familiar with the hourly rates charged by other civil rights and labor and employment attorneys (and their staffs), including attorneys who represent primarily plaintiffs and attorneys who represent primarily employers.
10. Consistent with the “lodestar” framework for analyzing attorney’s fees claims mandated in *Hensley v. Eckerhart*, 461 U.S. 424, 103 S.Ct 1933, 76 L.Ed.2d 40 (1983), as interpreted in *Norman v. Housing Authority of the City of Montgomery*, 836 F.2d 1292 (11th Cir. 1988) and *Perkins v. Mobile Housing Bd.*, 847 F.2d 735 (11th Cir. 1988), the following information is

intended to establish the reasonableness of the number of hours expended in this case, as well as the reasonableness of my hourly rate in light of the prevailing market conditions in the Atlanta, Georgia geographical area.

11. My hourly rate of \$425 per hour is reasonable and in line with the rates charged by other attorneys in the Atlanta area who possess similar skill, experience and training. I now charge most of my new clients \$425 per hour whether paid hourly or on a contingency fee basis and have done so since January of 2018. This rate was specifically approved in *Villa-Garcia v. Latin Mundo #2, Inc. et al.*, Civil Action No. 1:17-cv-1834-TWT, Dkt. 23 (N.D. Ga. Feb. 21, 2018) (approving \$425 for all partners, \$325 for associate Matthew Herrington, \$165 for senior paralegal Jessica Sorrenti, and \$125 for paralegal Sarah Toenes) and has been implicitly approved in numerous FLSA settlements as part of a settlement approval since that time. Accord, e.g., *Smith, et.al. v. Childfirst 24 Hour Childcare, et.al.*, 1:18-cv-03786-WMR, NDGa, Dkt. 56: "the attorney's fees . . . are reasonable and customary," *Haddock v. Jasper County, Georgia*, 5:18-cv-00292-MTT (MDGa, Dkt. 14)("[T]he attorneys' fees including the rates charged by counsel . . . are reasonable.")(See Id, Dkt. 13-1 for declaration providing information on identical rates for partners and paralegals in our firm); *Willis v. Nishi Dreams, et.al.* 1:19-CV-00986-AT (NDGa, Dkt. 17)(identical rates for attorneys and staff are "reasonable and customary").*Cooper, et.al., v. Parker Promotions, Inc*, Middle District of Georgia, 4:17-cv-00116-CDL, Dkt. 65 ("the attorneys' fees . . .") *Gertman v. City of Atlanta*, Civil Action

No. 1:17-cv-04960-MLB, Dkt. 82 (N.D. Ga. Sept. 25, 2020) (approving partner rates of \$425 for Bridgers, Fitzpatrick, and Benjamin as well as \$165 for Sorrenti and \$125 for Toenes stating, “The Court finds the hourly rates requested are reasonable . . .”); *Kelly v. BNFocus 3D Trucking, LLC et al.*, 1:20-cv-02781-WMR, Dkt. 19 (N.D. Ga. Oct. 15, 2020) (identical rates for Bridgers, Herrington, Toenes rates are “reasonable”).

12. Mr. Benjamin, a partner in the firm, represented the Plaintiff. He graduated from the State University of New York at Stony Brook in 1989, where he was a member of *Pi Sigma Alpha*, the National Political Science Honor Society. Thereafter, he attended Yeshiva University’s Benjamin N. Cardozo School of Law in New York City, graduating *Cum Laude* in 1993. He has been a member in good standing of the New York State bar since February, 1994 and the Georgia State bar since December, 1996. He has held an AV rating from Martindale-Hubbell since 2006 and has recently been ranked in Superlawyers. He has practiced labor and civil rights litigation since 1993 first in New York and then, from June of 1997 until December of 2000, as an associate attorney at Kirwan, Parks, Chesin & Miller, P.C. and successor firms. From December, 2000 through December, 2008, he was managing partner of the law firm of Johnson & Benjamin LLP and then Billips & Benjamin, LLP in which the focus of his practice was also labor and employment litigation. In June, 2015, he joined the firm of DeLong, Caldwell, Bridgers, Fitzpatrick & Benjamin LLC as a partner. During his career, he has participated in hundreds of federal employment/labor charges

and cases and have been lead counsel in a large number of cases including participation in multiple civil trial jury verdicts and collective actions under the FLSA. Mr. Benjamin's rate of \$425 is also reasonable. See listing of fee approvals above.

13. Matthew Herrington, our senior associate, assisted in this matter. Mr. Herrington has been practicing law since his graduation, *cum laude*, from the University of Georgia School of Law in 2013. He is admitted in all state courts in Georgia, the United States District Court for the Northern, Middle, and Southern Districts of Georgia, as well as the United States Court of Appeals for the Eleventh Circuit. He has practiced employment law—primarily Fair Labor Standards Act litigation—since approximately October 2013, primarily in the Atlanta metropolitan area but also throughout the state of Georgia. He has been an invited presenter at a CLE session organized by the Georgia chapter of the National Employment Lawyers Association. Mr. Herrington has served as counsel in over 100 FLSA cases, including several collective actions. He has acted as lead counsel on two jury trials and one bench trial. In May 2018, for instance, a jury awarded my five clients overtime wages, liquidated damages and attorneys' fees and costs of approximately \$814,000 in *Casey et al. v. 1400 Northside Drive, Inc.*, Civil Action No. 1:16-cv-4517-SCJ (N.D. Ga.). Other representative employment matters where he served as lead counsel include *Dean v. 1715 Northside Drive, Inc. et al.*, 1:14-cv-3775-CAP (N.D. Ga.); *Martin v. Jobo's, Inc. et al.*, 1:13-cv-4242-RWS (N.D. Ga.); and *Fowler et al. v. OSP Prevention*

Group et al., 1:17-cv-3911 (N.D. Ga.). Additionally, Mr. Herrington has twice presented oral argument before the Eleventh Circuit Court of Appeals on two occasions in FLSA matters. Mr. Herrington's rate of \$350 is reasonable in the Atlanta market. See listing of fee approvals above.

14. In representing the Plaintiff, we utilized the services of Ms. Jessica Sorrenti, senior paralegal. I am familiar with her backgrounds and skills. Ms. Sorrenti has worked as a paralegal for approximately twenty (20) years and with our firm for over nine years. She is fluent in Spanish and English. As the primary responsible attorney in our firm for this case, I have directed and supervised her efforts in this matter. Ms. Sorrenti's rate of \$165 is reasonable for a person of her experience in Atlanta, Georgia. See fee approval listing above. Also See *Villa-Garcia v. Latin Mundo #2, Inc. et al.*, Civil Action No. 1:17-cv-1834-TWT, Dkt. 23 (N.D. Ga. Feb. 21, 2018)(approving her rate at \$125 per hour); *Willis v. Nishi Dreams, et.al.* 1:19-CV-00986-AT, Dkt. 17 (N.D. Ga.) (identical rates for attorneys and staff are "reasonable and customary") (as part of FLSA approval motion)
15. Ms. Sarah Toenes, paralegal, also assisted in our representation. I am familiar with her backgrounds and skills. Ms. Toenes has worked as a paralegal for approximately ten years. As the primary responsible attorney in our firm for this case, I have directed and supervised her efforts in this matter. Ms. Toenes' rate of \$125 is reasonable for a person of her experience in Atlanta, Georgia. See *Villa-Garcia v. Latin Mundo #2, Inc. et al.*, Civil Action No. 1:17-cv-1834-TWT, Dkt. 23 (N.D. Ga. Feb. 21, 2018)

(approving her rate at \$125 per hour); *Willis v. Nishi Dreams*, et.al. 1:19-CV-00986-AT, Dkt. 17 (N.D. Ga.) (identical rates for attorneys and staff are “reasonable and customary”) (as part of FLSA approval motion).

16. I organized time billed (not expenses) into broad categories that reflect the phase of the litigation for both management, client budget, and fee application purposes. I have prepared a summary of those categories using the records of our firm. See Attachment D. (The substance of Attachment D’s billing records is the same as Attachment A except Attachment D is organized by category). The categorization is accurate for providing an overview of the effort incurred during each phase of the litigation given the limitation that it is sometimes difficult to categorize an individual entry with 100 percent certainty.
17. In further explanation of Attachment D, the following chart provides a description of the phases of litigation and how they are categorized along with a total amount of fees incurred per category (not expenses) incurred.

Phase of Litigation	Description	Amount and Percentage Billed Per Phase
01-Intake	Initial meetings with clients; initial development of factual narrative, advice about the process of litigation, decision to proceed, extensive pre-litigation settlement negotiations, and explanation of DCBFB Client	\$1,285.58 9.69%

	instructions and Retainer Agreement	
02-Complaint_COIP_Service	Initial factual investigation; draft and revisions of Complaint; client review of Complaint; Certificate of Interested Persons	\$3,782.79 28.50%
03-Answer_Disclosures_JPR	Review of Answer(s) filed; drafting, reviewing and finalizing Disclosures and Joint Preliminary Report	\$3,166.99 23.86%
06-DamageEst	Damage Estimate: Efforts reviewing time and pay records to prepare an estimate of Plaintiff's damages	\$604.25 4.55%
09-Protective-Order	Efforts re protective order motion and terms	\$42.50 0.32%
13-Motions	Drafting and Responding to Motions including motion to extend time to answer and motion to approve settlement.	\$1,084.00 8.17%
16-Settlement	Efforts to resolve matter including negotiation and attempts to resolve attorney fee issues	\$1,437.25 10.83%
26-Client Comm	General communication with client during scope of representation not otherwise categorized	\$35.00 0.26%
27-Legal Research Other	Conduct legal research not otherwise categorized	\$131.75 0.99%
29-Misc	Miscellaneous Duties Related to Case, review of incoming correspondence, incoming	\$134.50 1.01%

	orders, extensions, staff assignments	
30-Factual Development	Interviewing witnesses and reviewing facts not otherwise categorized	\$1,568.24 11.82%

18. Based on my experience and training, I possess the requisite skills and knowledge to adequately represent my client and to offer my professional opinion concerning the reasonableness of the number of hours expended in this case and the reasonableness of the hourly rates sought to be recovered.
19. In preparation for this Motion and in exercise of our “billing judgment”, I reviewed the fees and costs. I marked a few entries as “no charge” because they had to do with a financial transaction only tangentially related to this matter. I also deleted a few entries entirely that I could not confirm were related to this matter.
20. The expenses and the effort incurred were reasonable to prosecute this matter and to obtain an excellent result for the Plaintiff. Although several persons worked on this matter, as demonstrated in attachments to this declaration, none of the hours expended by counsel or staff has been “excessive,” “redundant” or “unnecessary.” To the contrary, at every opportunity, Plaintiff’s attorneys attempted to economize and to minimize expenses. As the Court will note, our staff members bill at different rates depending on their experience level. We attempt to assign tasks to the appropriate person to reduce the overall bill.

21. In light of the factors specified in *Johnson v. Georgia Highway Express*, 488 F.2d 714 (5th Cir 1974), the total fees and costs as set out above is eminently reasonable.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 25th day of January 2021.

s/ Charles R. Bridgers
Charles R. Bridgers
Georgia Bar No. 080791

ATTACHMENT A

1/22/2021
12:52 PMDeLong Caldwell Bridgers Fitzpatrick & Benjamin, LLC
Slip Listing

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Selection Criteria

Clie.Selection	Include: Harris, Ardra
Slip.Transaction Type	Time
Slip.Classification	Open

Rate Info - identifies rate source and level

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client		Bill Status	
Description		Reference			
142769	TIME	C.R. Bridgers	0.85	425.00	361.25
4/24/2020		Intake	0.00	T@1	
WIP		Harris, Ardra			
Ardra Harris: Intake interview with client; discuss with Benjamin.					
142814	TIME	C.R. Bridgers	1.10	425.00	467.50
4/24/2020		Intake	0.00	T@1	
WIP		Harris, Ardra			
Ardra Harris: Calls with potential client and discuss with Benjamin.					
142878	TIME	M. Benjamin	0.67	425.00	283.33
4/24/2020		Intake	0.00	T@1	
WIP		Harris, Ardra			
Telephone conference with Ardra Harris for initial intake					
142828	TIME	S. Toenes	0.30	125.00	37.50
4/29/2020		Intake	0.00	T@1	
WIP		Harris, Ardra			
Edit retainer; send retainer, client info sheet, client intake sheet to client via Docusign; email with MDB					
142877	TIME	M. Benjamin	0.25	425.00	106.25
5/4/2020		Compl_COIP_Ser	0.00	T@1	
WIP		Harris, Ardra			
Type up intake notes for Sorrenti to draft complaint.					
142973	TIME	J. Sorrenti	3.50	165.00	577.50
5/7/2020		Compl_COIP_Ser	0.00	T@1	
WIP		Harris, Ardra			
File review; emails to and from CRB/MDB; internet and legal research on Defendant; processing; began drafting Complaint; call to client-left message					

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Slip Listing

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client		Bill Status	
Description	Reference			
143030 TIME	J. Sorrenti	0.90	165.00	148.50
5/11/2020	Compl_COIP_Ser	0.00	T@1	
WIP	Harris, Ardra			
Call to client and obtained additional info. for Complaint; began revising drafted Complaint; prepared memo re: additional info. from client; email to client; email to CRB/MDB				
143040 TIME	J. Sorrenti	0.30	165.00	49.50
5/12/2020	Compl_COIP_Ser	0.00	T@1	
WIP	Harris, Ardra			
Emails to and from client re: job descriptions; email to CRB/MDB ; processing and review				
143045 TIME	M. Benjamin	0.20	425.00	85.00
5/12/2020 12:02 PM	Factual Development	0.00	T@1	
WIP	Harris, Ardra			
Review documents provided by client, including job descriptions for various positions.				
143055 TIME	J. Sorrenti	1.50	165.00	247.50
5/12/2020	Compl_COIP_Ser	0.00	T@1	
WIP	Harris, Ardra			
Call to client and concluded conversation re: additional info. needed for Complaint; finished preparing memo re: additional info. from client; discussion with CRB re: jurisdiction; email to CRB/MDB ; began finalizing drafted Complaint to include additional info. obtained from client				
143072 TIME	C.R. Bridgers	0.41	425.00	174.25
5/12/2020	Compl_COIP_Ser	0.00	T@1	
WIP	Harris, Ardra			
Review questions of venue with Sorrenti , Benjamin.				
143056 TIME	J. Sorrenti	2.00	165.00	330.00
5/13/2020	Compl_COIP_Ser	0.00	T@1	
WIP	Harris, Ardra			
File review and review of client docs; finished finalizing draft of Complaint; emails to and from CRB/MDB ; revised and finalized Complaint; email to client re: reviewing Complaint and docs needed				
143061 TIME	M. Benjamin	1.50	425.00	637.50
5/13/2020 12:12 PM	Compl_COIP_Ser	0.00	T@1	
WIP	Harris, Ardra			
Review and revise draft of complaint and accompanying documents.				

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Slip Listing

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client		Bill Status	
Description		Reference			
143107	TIME	J. Sorrenti	0.50	165.00	82.50
5/15/2020		Compl_COIP_Ser	0.00	T@1	
WIP		Harris, Ardra			
Call to client and discussed Complaint and documents needed; email to client; emails to and from MDB					
143117	TIME	M. Benjamin	0.37	425.00	155.83
5/18/2020	12:10 PM	Factual Development	0.00	T@1	
WIP		Harris, Ardra			
Review pay stubs, synopsis and work emails from client.					
143130	TIME	J. Sorrenti	2.00	165.00	330.00
5/18/2020		Compl_COIP_Ser	0.00	T@1	
WIP		Harris, Ardra			
Emails to and from client; processing and review of documents from client; emails to and from MDB ; call to client and obtained additional information and clarification for drafted Complaint					
143148	TIME	M. Benjamin	0.87	425.00	368.33
5/19/2020	1:51 PM	Compl_COIP_Ser	0.00	T@1	
WIP		Harris, Ardra			
Review and revise draft of complaint.					
143199	TIME	J. Sorrenti	1.90	165.00	313.50
5/19/2020		Compl_COIP_Ser	0.00	T@1	
WIP		Harris, Ardra			
Discussion with MDB re: additional info. from client; edited and revised drafted Complaint to include additional info. from client; emails to and from MDB ; email to client with revised final draft of Complaint; call to client					
143181	TIME	C.R. Bridgers	0.31	425.00	131.75
5/20/2020		Research-Legal	0.00	T@1	
WIP		Harris, Ardra			
Review venue issues with Benjamin and Herrington .					
143202	TIME	J. Sorrenti	0.60	165.00	99.00
5/20/2020		Compl_COIP_Ser	0.00	T@1	
WIP		Harris, Ardra			
Emails to and from client; discussion with CRB re: additional research on jurisdiction; prepared Civil Cover Sheet and Summons					

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Slip Listing

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client		Bill Status	
Description		Reference			
143203	TIME	J. Sorrenti	0.60	165.00	99.00
5/21/2020		Compl_COIP_Ser	0.00	T@1	
WIP		Harris, Ardra			
Filed Complaint, Civil Cover and Summons with Court; email to CRB/MDB/FH re: filing fee; email to CRB/MDB/MH/SMT re: service; emails to and from MDB/CRB re: court's changes in Division and Judges					
143204	TIME	C.R. Bridgers	0.31	425.00	132.46
5/21/2020	11:28 AM	Compl_COIP_Ser	0.00	T@1	
WIP		Harris, Ardra			
Review filng and responses of Court of errors and transfer to Albany District; Emails to Sorrenti and Benjamin re same.					
143411	TIME	C.R. Bridgers	0.10	425.00	42.50
6/5/2020		Ans_DiscI_JPS	0.00	T@1	
WIP		Harris, Ardra			
Review incormign representation letter, notes to file.					
143514	TIME	C.R. Bridgers	0.32	425.00	136.00
6/14/2020		Intake	0.00	T@1	
WIP		Harris, Ardra			
review status of critical date background. Notes to Toenes .					
143521	TIME	J. Sorrenti	0.30	165.00	49.50
6/15/2020		Compl_COIP_Ser	0.00	T@1	
WIP		Harris, Ardra			
Discussion with MH re: facts of case and call he received from opposing counsel re: demand; emails to and from MDB/MH/CRB					
143522	TIME	M. Benjamin	0.10	425.00	42.50
6/15/2020		Settlement	0.00	T@1	
WIP		Harris, Ardra			
Telephone conference with Herrington re: damages and settlement.					
143528	TIME	M. Herrington	0.30	350.00	105.00
6/15/2020		DamageEst	0.00	T@1	
WIP		Harris, Ardra			
call and email with OC ; discuss damages calculation issues with JLS and MDB ; review stipulation to extend time to answer; review complaint					

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Slip Listing

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client		Bill Status	
Description	Reference			
143553 TIME	S. Toenes	0.30	125.00	37.50
6/16/2020	Compl_COIP_Ser	0.00	T@1	
WIP	Harris, Ardra			
Draft COIP ; electronically file COIP				
143757 TIME	M. Benjamin	0.20	425.00	85.00
6/26/2020	Ans_Disc_JPS	0.00	T@1	
WIP	Harris, Ardra			
Review Defendant's Answer.				
143759 TIME	J. Sorrenti	0.60	165.00	99.00
6/26/2020	Factual Development	0.00	T@1	
WIP	Harris, Ardra			
Emails to and from MDB re: status and Answer; review of Answer; email to client re: Answer and witness info, needed				
143800 TIME	J. Sorrenti	0.20	165.00	33.00
6/29/2020	Factual Development	0.00	T@1	
WIP	Harris, Ardra			
Emails to and from client re: witnesses; email to MH/MDB/CRB re: witness info. from client				
143849 TIME	J. Sorrenti	1.30	165.00	214.50
7/1/2020	Ans_Disc_JPS	0.00	T@1	
WIP	Harris, Ardra			
File review; drafted Proposed Scheduling Order; emails to and from MDB				
144058 TIME	S. Toenes	1.50	125.00	187.50
7/1/2020	Ans_Disc_JPS	0.00	T@1	
WIP	Harris, Ardra			
Draft Interlineated Table of Complaint and Answer				
144061 TIME	M. Benjamin	0.25	425.00	106.25
7/15/2020	Ans_Disc_JPS	0.00	T@1	
WIP	Harris, Ardra			
Review and revise draft of Rule 6/26 Scheduling order; email to Sorrenti re: same.				
144062 TIME	J. Sorrenti	1.00	165.00	165.00
7/15/2020	Ans_Disc_JPS	0.00	T@1	
WIP	Harris, Ardra			
File review; drafted scheduling Order; email to MDB/CRB				

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Slip Listing

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client		Bill Status	
Description	Reference			
144098 TIME	J. Sorrenti	0.20	165.00	33.00
7/16/2020	Ans_DiscI_JPS	0.00	T@1	
WIP	Harris, Ardra			
Emails to and from MDB ; email to SMT re; calendaring				
144280 TIME	S. Toenes	0.10	125.00	12.50
7/16/2020	Ans_DiscI_JPS	0.00	T@1	
WIP	Harris, Ardra			
Email opposing counsel to schedule 26F conference				
144245 TIME	J. Sorrenti	0.30	165.00	49.50
7/21/2020	Factual Development	0.00	T@1	
WIP	Harris, Ardra			
Discussion with MDB re: status; discussion with MH re: witnesses; email to MH				
144185 TIME	M. Benjamin	1.00	425.00	425.00
7/23/2020	Ans_DiscI_JPS	0.00	T@1	
WIP	Harris, Ardra			
Prepare for Rule 26(f) conference by reviewing pleadings, attorney notes and draft of planning report; make rough calculation of damages.				
144186 TIME	J. Sorrenti	0.30	165.00	49.50
7/23/2020	Ans_DiscI_JPS	0.00	T@1	
WIP	Harris, Ardra			
Emails to and from MDB/MH re: case info./docs; file review				
144190 TIME	M. Benjamin	0.37	425.00	155.83
7/23/2020	Ans_DiscI_JPS	0.00	T@1	
WIP	Harris, Ardra			
Telephone conference with opposing counsel for Rule 26(f) conference.				
144192 TIME	M. Benjamin	0.52	425.00	219.58
7/23/2020 2:21 PM	Ans_DiscI_JPS	0.00	T@1	
WIP	Harris, Ardra			
Revise draft of Planning Report as per telephone conference with opposing counsel for Rule 26(f) conference; draft email to opposing counsel with draft of scheduling order.				

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client		Bill Status	
Description	Reference			
144383 TIME	J. Sorrenti	0.30	165.00	49.50
8/5/2020	Misc	0.00	T@1	
WIP	Harris, Ardra			
File review; email to MDB/CRB/MH re: status				
144399 TIME	M. Benjamin	0.92	425.00	389.58
8/6/2020	Ans_Disc_JPS	0.00	T@1	
WIP	Harris, Ardra			
Review and revise Plaintiff's Initial Disclosures including damages calculation; draft email to Sorrenti and Herrington with assigned tasks.				
144400 TIME	J. Sorrenti	2.40	165.00	396.00
8/6/2020	Ans_Disc_JPS	0.00	T@1	
WIP	Harris, Ardra			
File review; drafted Initial Disclosures; call to client and obtained additional info. to complete drafted Disclosures; revised Disclosures to include additional info. from client; emails to and from MDB				
144585 TIME	M. Benjamin	0.20	425.00	85.00
8/7/2020	Ans_Disc_JPS	0.00	T@1	
WIP	Harris, Ardra			
Review proposed changes to the draft of the Planning Report from opposing counsel.				
144426 TIME	J. Sorrenti	0.70	165.00	115.50
8/10/2020	Factual Development	0.00	T@1	
WIP	Harris, Ardra			
Emails to and from MDB/CRB/MH ; review of time and pay records from Defendants;				
144582 TIME	J. Sorrenti	0.08	165.00	13.75
8/19/2020	Ans_Disc_JPS	0.00	T@1	
WIP	Harris, Ardra			
Emails to and from opposing counsel re: status and filing JPR				
144590 TIME	C.R. Bridgers	0.10	425.00	42.50
8/19/2020	Misc	0.00	T@1	
WIP	Harris, Ardra			
Discuss status of discovery deadline with Herrington .				
144612 TIME	M. Benjamin	0.42	425.00	177.08
8/20/2020	Factual Development	0.00	T@1	
WIP	Harris, Ardra			
Review documents produced by Defendant.				

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client		Bill Status	
Description		Reference			
144613	TIME	M. Benjamin	0.17	425.00	70.83
8/20/2020		Factual Development	0.00	T@1	
WIP		Harris, Ardra			
Review documents produced by Plaintiff.					
144614	TIME	M. Benjamin	0.20	425.00	85.00
8/20/2020		Factual Development	0.00	T@1	
WIP		Harris, Ardra			
Review draft of Initial Disclosures					
144615	TIME	M. Benjamin	0.50	425.00	212.50
8/20/2020		Factual Development	0.00	T@1	
WIP		Harris, Ardra			
Telephone conference with Sorrenti re: damage calculations and witness statements and records to be obtained.					
144617	TIME	J. Sorrenti	0.80	165.00	132.00
8/20/2020		DamageEst	0.00	T@1	
WIP		Harris, Ardra			
Email to MDB/CRB/MH re: additional docs needed from Defendants; Discussion with MDB; file review; call to client; email to client;					
144633	TIME	C.R. Bridgers	0.26	425.00	110.50
8/21/2020		Factual Development	0.00	T@1	
WIP		Harris, Ardra			
Review email from client re incident reports and tracking time, respond to client with request for additional information.					
144651	TIME	J. Sorrenti	0.30	165.00	49.50
8/21/2020		Factual Development	0.00	T@1	
WIP		Harris, Ardra			
Emails to and from client re: documents to be requested					
144725	TIME	C.R. Bridgers	0.10	425.00	42.50
8/25/2020		Ans_DiscI_JPS	0.00	T@1	
WIP		Harris, Ardra			
Send email re JPR/ Discuss with Sorrenti.					
144727	TIME	C.R. Bridgers	0.16	425.00	68.00
8/25/2020		Factual Development	0.00	T@1	
WIP		Harris, Ardra			
Follow up with Sorrenti and Herrington re witness calls; notes to file for follow up.					

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client		Bill Status	
Description		Reference			
144738	TIME	J. Sorrenti	0.50	165.00	82.50
8/25/2020		Ans_DiscI_JPS	0.00	T@1	
WIP		Harris, Ardra			
Emails to and from CRB re: JPR; file review and review of emails from client re: relevant docs; emails to and from CRB/MDB/MH re: Disclosures and list of documents to be requested informally; discussion with CRB					
144763	TIME	J. Sorrenti	0.30	165.00	49.50
8/26/2020		Ans_DiscI_JPS	0.00	T@1	
WIP		Harris, Ardra			
Revised and finalized Joint Proposed Scheduling and Discovery Order and emailed to court and all parties					
144783	TIME	C.R. Bridgers	0.10	425.00	42.50
8/27/2020		Misc	0.00	T@1	
WIP		Harris, Ardra			
Review email from court re necessity of scheduling conference, review defendants response, and forward to Benjamin with request to respond.					
145169	TIME	C.R. Bridgers	0.10	425.00	42.50
9/15/2020		Protect_Order	0.00	T@1	
WIP		Harris, Ardra			
Review incoming protective order executed by Court; notes to file.					
145215	TIME	M. Herrington	0.10	350.00	35.00
9/16/2020		ClientComm	0.00	T@1	
WIP		Harris, Ardra			
Review JLS correspondence with client; discuss evidence issues with JLS					
145224	TIME	C.R. Bridgers	0.10	425.00	42.50
9/16/2020		Factual Development	0.00	T@1	
WIP		Harris, Ardra			
Review emails to client re log book. Email to Benjamin re future assignments.					
145235	TIME	J. Sorrenti	0.80	165.00	132.00
9/16/2020		Factual Development	0.00	T@1	
WIP		Harris, Ardra			
Discussion with MH re: docs received from defense counsel; emails to and from MDB and MH; review of log books received; email to client re: additional info. needed					

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client		Bill Status	
Description		Reference			
145327	TIME	J. Sorrenti	0.10	165.00	16.50
9/18/2020		Factual Development	0.00	T@1	
WIP		Harris, Ardra			
Call to client-left message ; email to client					
145353	TIME	J. Sorrenti	0.50	165.00	82.50
9/21/2020		Ans_Disclosure_JPS	0.00	T@1	
WIP		Harris, Ardra			
File review; review drafted Disclosures and damages; emails to MDB/CRB/MH re: status and Disclosures; call to client - left message					
145474	TIME	C.R. Bridgers	0.10	425.00	42.50
9/23/2020		Settlement	0.00	T@1	
WIP		Harris, Ardra			
Review incoming email from opp counsel re settlement offer; follow up with Benjamin and ntoes to file.					
145483	TIME	C.R. Bridgers	0.23	425.00	97.75
9/23/2020		Settlement	0.00	T@1	
WIP		Harris, Ardra			
Respond as to settlement possibility and damage calculation.					
145523	TIME	J. Sorrenti	0.40	165.00	66.00
9/23/2020		Factual Development	0.00	T@1	
WIP		Harris, Ardra			
Emails to and from client; file review; ;emails to and from MDB/MH/CRB					
145509	TIME	M. Herrington	0.10	350.00	35.00
9/24/2020		DamageEst	0.00	T@1	
WIP		Harris, Ardra			
Discuss damages estimate issues with JLS					
145514	TIME	J. Sorrenti	0.50	165.00	82.50
9/24/2020		DamageEst	0.00	T@1	
WIP		Harris, Ardra			
Discussion with MH ; discussion with CRB re: range of damages; emails to and from MDB/MH/CRB ; call to client-left message					
145531	TIME	C.R. Bridgers	0.29	425.00	123.25
9/24/2020		DamageEst	0.00	T@1	
WIP		Harris, Ardra			
MEeting with Herrington and Sorrenti re offer and need for more records.					

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client		Bill Status	
Description		Reference			
145565	TIME	M. Herrington	0.80	350.00	280.00
9/25/2020		Ans_Disc_JPS	0.00	T@1	
WIP		Harris, Ardra			
Revising initial disclosures; reviewing Def initial disclosures					
145604	TIME	J. Sorrenti	0.30	165.00	49.50
9/25/2020		Ans_Disc_JPS	0.00	T@1	
WIP		Harris, Ardra			
Emails to and from MDB/CRB/MH re: Disclosures; discussed info. contained in Disclosures with MH					
145592	TIME	J. Sorrenti	0.20	165.00	33.00
9/29/2020		DamageEst	0.00	T@1	
WIP		Harris, Ardra			
Review of info. from client; email to CRB/MDB/MH ; emails to and from client					
145625	TIME	M. Herrington	0.70	350.00	245.00
9/30/2020		Settlement	0.00	T@1	
WIP		Harris, Ardra			
Call with OC ; discuss counteroffer with CRB ; call MDB re: same; call client re: same; draft counteroffer to OC					
145639	TIME	C.R. Bridgers	0.34	425.00	144.50
9/30/2020		Settlement	0.00	T@1	
WIP		Harris, Ardra			
Work with Herrington on offer / counter offer / and second round.					
145763	TIME	C.R. Bridgers	0.23	425.00	97.75
10/5/2020		Settlement	0.00	T@1	
WIP		Harris, Ardra			
Review Herrington email re settlement counterproposal. Email to Ardra Harris re same and her quetions .					
145817	TIME	C.R. Bridgers	0.22	425.00	93.50
10/8/2020		DamageEst	0.00	T@1	
WIP		Harris, Ardra			
Respond to Herrington /Benjamin on last offer.					
145829	TIME	M. Herrington	0.10	350.00	35.00
10/8/2020		Settlement	0.00	T@1	
WIP		Harris, Ardra			
Review correspondence from OC ; arrange tax form production with CRB and client; send allocation to					

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client		Bill Status	
Description	Reference			
OC				
145846 TIME	C.R. Bridgers	0.34	425.00	144.50
10/8/2020 Settlement		0.00	T@1	
WIP Harris, Ardra				
Discuss final settlemetn with Herrington .				
145853 TIME	M. Herrington	0.60	350.00	210.00
10/9/2020 Settlement		0.00	T@1	
WIP Harris, Ardra				
Review settlement documents; call with client; correspondence with OC				
146167 TIME	C.R. Bridgers	0.10	425.00	42.50
10/30/2020 Settlement		0.00	T@1	
WIP Harris, Ardra				
review motion for settlemetn and notes to file.				
147081 TIME	C.R. Bridgers	0.25	425.00	105.42
12/17/2020 11:15 AM Misc		0.25	T@1	
WIP Harris, Ardra			No Charge	
Review settlement agreement to assist in determination of proceeds loan; Communicate with Herrington re same.				
147101 TIME	J. Sorrenti	0.10	165.00	16.50
12/17/2020 Settlement		0.00	T@1	
WIP Harris, Ardra				
Emails to and from MH				
147120 TIME	M. Herrington	0.50	350.00	175.00
12/18/2020 Settlement		0.50	T@1	
WIP Harris, Ardra			No Charge	
Review communication from lender; discuss firm policies with client; discuss lending issue with CRB ; review settlement motion and settlement terms; send settlement to lender; advise client on firm position on lending				
147123 TIME	C.R. Bridgers	0.75	425.00	318.75
12/21/2020 Settlement		0.00	T@1	
WIP Harris, Ardra				
Prepare Disbursement and Distribution.				

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client		Bill Status	
Description		Reference			
147425	TIME	M. Herrington	0.70	350.00	245.00
1/19/2021		Motions	0.00	T@1	
WIP		Harris, Ardra			
Drafting supplemental brief for fees motion					
147426	TIME	M. Herrington	0.40	350.00	140.00
1/19/2021		Motions	0.00	T@1	
WIP		Harris, Ardra			
Begin drafting declaration for supplemental brief to fees motion; discuss with CRB need for him to complete declaration rather than me					
147446	TIME	C.R. Bridgers	0.23	425.00	97.75
1/19/2021		Motions	0.00	T@1	
WIP		Harris, Ardra			
Review issues on Bridgers declaration and strategy on filing same.					
147444	TIME	M. Herrington	0.20	350.00	70.00
1/20/2021		Motions	0.00	T@1	
WIP		Harris, Ardra			
Finalize revisions to supplemental brief; forward to CRB for review					
147497	TIME	C.R. Bridgers	1.25	425.00	531.25
1/22/2021		Motions	0.00	T@1	
WIP		Harris, Ardra			
Draft and edit Bridgers Declaration on Fees.					
Grand Total					
			49.59		13272.85
			0.75		280.42
			50.34		13553.27

ATTACHMENT B

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Slip Listing

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 Selection Criteria

Clie.Selection	Include: Harris, Ardra
Slip.Transaction Type	Expense
Slip.Classification	Open

Rate Info - identifies rate source and level

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client		Bill Status	
Description		Reference			
143224	EXP	W & H Project	1	400.00	400.00
5/21/2020		\$Filing Fee			
WIP		Harris, Ardra			
Filing Fee					
144680	EXP	W & H Project	1	85.00	85.00
8/24/2020		\$Service Fee			
WIP		Harris, Ardra			
Service Fee for Process					
Grand Total					
		Billable	0.00		485.00
		Unbillable	0.00		0.00
		Total	0.00		485.00

ATTACHMENT C

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--DCBFB Fee Split and Fee App Time Summary Listing-By Timekeeper

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Selection Criteria

Slip.Slip Type Clie.Selection	Time Include: Harris, Ardra
----------------------------------	--------------------------------

Rate Info - identifies rate source and level

Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
C.R. Bridgers	Billable	8.40		3570.71	3570.71
	Unbillable	0.25		105.42	
	Total	8.65		3676.13	
J. Sorrenti	Billable	26.28		4336.75	4336.75
	Unbillable	0.00		0.00	
	Total	26.28		4336.75	
M. Benjamin	Billable	8.71		3690.39	3690.39
	Unbillable	0.00		0.00	
	Total	8.71		3690.39	
M. Herrington	Billable	4.00		1400.00	1400.00
	Unbillable	0.50		175.00	
	Total	4.50		1575.00	
S. Toenes	Billable	2.20		275.00	275.00
	Unbillable	0.00		0.00	
	Total	2.20		275.00	
Grand Total	Billable	49.59		13272.85	13272.85
	Unbillable	0.75		280.42	
	Total	50.34		13553.27	

ATTACHMENT D

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--DCBFB Slip Summary by Activity-Summary Only-No Detail

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Selection Criteria				
Slip.Billing Status	Billable			
Slip.Slip Type	Time			
Clie.Selection	Include: Harris, Ardra			
Title	Amount	% Total	Time	% Total
01-Intake				
Fees: Slip Value	1285.58	9.69%	3.24	6.53%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	1285.58	9.69%	3.24	6.53%
02-Complaint_COIP_Service				
Fees: Slip Value	3782.79	28.50%	17.74	35.77%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	3782.79	28.50%	17.74	35.77%
03-Answer_Disclosures_JPR				
Fees: Slip Value	3166.99	23.86%	12.94	26.09%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	3166.99	23.86%	12.94	26.09%
06-Damage Estimate				
Fees: Slip Value	604.25	4.55%	2.41	4.86%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	604.25	4.55%	2.41	4.86%
09-Protect_Order				
Fees: Slip Value	42.50	0.32%	0.10	0.20%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	42.50	0.32%	0.10	0.20%
13-Motions				
Fees: Slip Value	1084.00	8.17%	2.78	5.61%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	1084.00	8.17%	2.78	5.61%
16-Settlement				
Fees: Slip Value	1437.25	10.83%	3.69	7.44%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	1437.25	10.83%	3.69	7.44%
26-Client Communication				
Fees: Slip Value	35.00	0.26%	0.10	0.20%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	35.00	0.26%	0.10	0.20%
27-Legal Research Other				
Fees: Slip Value	131.75	0.99%	0.31	0.63%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	131.75	0.99%	0.31	0.63%
29-Misc. Case Efforts				
Fees: Slip Value	134.50	1.01%	0.50	1.01%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	134.50	1.01%	0.50	1.01%
30-Fact Develop (not otherwise)				
Fees: Slip Value	1568.24	11.82%	5.78	11.66%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	1568.24	11.82%	5.78	11.66%
Grand Total				
Fees: Slip Value	13272.85	100.00%	49.59	100.00%

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--DCBFB Slip Summary by Activity-Summary Only-No Detail

Title	Amount	% Total	Time	% Total
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	13272.85	100.00%	49.59	100.00%